

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TRACI SHAW,

Plaintiff,

-vs-

RICHARD WOZNIAK, *et al.*,

Defendants.

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Case No. 2:23-cv-942

Judge James L. Graham

Magistrate Judge Elizabeth P. Deavers

**JOINT MOTION TO AMEND RULE 26(f) REPORT REGARDING THE DISCOVERY
CUT-OFF AND THE DISPOSITIVE MOTION DEADLINE**

AND

JOINT MOTION TO CONTINUE THE FINAL PRETRIAL AND TRIAL DATE

Now come the parties, jointly, and request an Order briefly amending the Rule 26(f) Report adopted by this Court regarding the discovery cut-off as well as the deadline for filing a dispositive motion. The Defendants' rebuttal experts are presently due after the discovery cut-off and the Parties wish to make sure that expert discovery can be completed within the required time frame for completion of discovery. Therefore, the Parties jointly request the discovery cut-off be extended to June 14, 2024, and the deadline to file a dispositive motion to July 12, 2024.

In addition, the Court, *sua sponte*, issued a Notice of Final Pretrial and Trial, scheduling the final pretrial on August 23, 2024, and the trial on September 23, 2024. Counsel for Plaintiff has two trials scheduled for September 23, 2024, that were scheduled prior to this Court issuing its Notice. The parties respectfully request a status conference with the Court to coordinate the parties respect availability for a trial date in early 2025.

Respectfully submitted,

/s/ David A. Goldstein

DAVID A. GOLDSTEIN (0064461)
DAVID A. GOLDSTEIN CO., L.P.A.
511 S. High Street, Suite 200
Columbus, Ohio 43215
(614) 222-1889
(614) 222-1899 (Fax)
dgoldstein@dgoldsteinlaw.com
Attorney for Plaintiff

/s/ Molly Gwin

Molly R. Gwin (0088189)
Two Miranova Place, Suite 700
Columbus, Ohio 43215
Phone: 614-221-2121
Fax: 614-365-9516
mgwin@isaacwiles.com
(614) 221-8769 (Fax)
*Attorney for Defendants Richard
Wozniak and City of Columbus*

CERTIFICATE OF SERVICE

This certifies that the foregoing was filed electronically. Notice of this filing will be sent to all counsel by operation of the Court's electronic filing system, as certified by the Court's Certificate of Service generated upon filing.

/s/ David A. Goldstein

DAVID A. GOLDSTEIN (0064461)